Review Comments
Stormwater Pollution Control Plan
Tube Forgings of America, Inc.
5200 NW Front Avenue
Portland, Oregon 97210
December 19, 2014

Submitted December 1, 2015

Following are the United States Environmental Protection Agency's (EPA) comments on the December 19, 2014 document titled *Stormwater Pollution Control Plan, Tube Forgings of America, Inc., 5200 NW Front Avenue, Portland, Oregon 97210* (SWPCP), prepared for Tube Forgings of America, Inc. by Bridgewater Group, Inc. The SWPCP was prepared to comply with National Pollutant Discharge Elimination System (NPDES) 1200-Z Permit requirements, and is intended to prevent the release of contaminated stormwater from the site into the Willamette River. The Tube Forgings of America, Inc. facility (ECSI# 1239) is designated as Standard Industrial Classification (SIC) Code 3498 for fabricated pipe and fittings. The facility has one direct outfall to the Willamette River and contributes flows to the City of Portland's Outfall 19. The SWPCP was first developed in 2006, and is revised as necessary to reflect changing conditions and regulatory requirements. The December 19, 2014 version is the third revision made to the SWPCP.

General Comments

1. The table below summarizes the information presented in the SWPCP and EPA's recommendations for the Tube Forgings of America facility. Based on current information, EPA recommends that Tube Forgings of America continue implementing 1200-Z permit Tier II corrective actions and document treatment system performance in a Tier II Benchmark Exceedance Report. Additional corrective actions including improvements to the stormwater treatment system may be needed if 1200-Z benchmarks are not met. Comparisons to Portland Harbor Joint Source Control Strategy (JSCS) Screening Level Values (SLVs) and Preliminary Remediation Goals (PRGs) are recommended to help inform a Source Control Decision.

EPA Site Status Summary – Tube Forgings of America Facility

Question	Answer	Description
Are source control measures being implemented?	Yes	Spill prevention and response procedures, preventative maintenance, employee awareness program, secondary containment, erosion and sediment controls, routine sweeping, catch basin inserts, oil/water separators, stormwater filtration system.
Are there JSCS SLV exceedances?	NA	Comparisons to JSCS SLVs were not provided, but should be included in the Tier II Benchmark Exceedance Report.
Are there stormwater PRG exceedances?	NA	Comparisons to PRGs were not provided, but should be included in the Tier II Benchmark Exceedance Report.
Are pollutant concentrations typical of Portland Harbor industrial sites (e.g. below the knee of the curve)?	NA	Comparisons to rank-order curves were not provided, but should be considered in the Tier II Benchmark Exceedance Report to inform a Source Control Decision.
Are stormwater COCs from this site the same as those defined for the associated SDU/SMA?	Yes	Copper, Zinc.
Do sampled stormwater events meet JSCS criteria?	NA	Descriptions of 1200-Z permit sampling was not provided.
Is further stormwater data collection recommended?	Yes	Collect effluent samples for the treatment systems and summarize results in a Tier II Benchmark Exceedance Report.
Are additional source control measures recommended?	No	Evaluate effectiveness of existing source control measures in a Tier II Benchmark Exceedance Report.

Specific Comments

1. Revision Schedule: The Revision Schedule at the beginning of the SWPCP should describe which sections were updated during each revision to facilitate review.

2. Section 1.1. Background: The background states that the 1200-Z permit expired on June 30, 2012, but makes no mention about whether Tube Forgings renewed its coverage under the July 1, 2012 reissued permit.

3. Section 2.3 Site Drainage: Drainage Basin 1 paragraph, describes Outfall 1 (WP-7), but this is not clearly identified in Figure 2. Alternatively, clarify in Section 2.3 that Outfall 1 (WP-7) is identified in Figure 2 as C-5.

4. Section 2.6 Receiving Water: According to the *Portland Harbor Upland Source Control Summary Report* (DEQ, 2014), Contaminants of Interest (COIs) in Area of Potential Concern (AOPC) 18 include aluminum, barium, cadmium, copper, iron, manganese, mercury, silver, zinc, PCBs, PAHs, delta-HCCH, dieldrin, endrin, and chloroethane. The presence of these COIs in stormwater runoff leaving the site should be evaluated as part of the Tier II Benchmark Exceedance Report.

5. Sections 4.1.4 - 4.1.7.: Describe how sediment, debris, and other wastes are disposed after removal/cleaning/sweeping.

6. Appendix A, Section 6 Proposed Stormwater Treatment Measures: Further information regarding the capacity of the pumps in the lift stations should be provided to confirm that the installed system is capturing the required water quality flow rate (Q_{wq}). Operations and maintenance requirements for the lift stations should be provided in Appendix B.

7. Appendix A, Section 7 Expected Treatment Performance: A Tier II Benchmark Exceedance Report is needed to evaluate the effectiveness of the stormwater treatment system in reducing pollutant concentrations below 1200-Z permit benchmarks. To inform a Source Control Decision, the Benchmark Exceedance Report should also include comparisons of results to Portland Harbor Joint Source Control Strategy (JSCS) Screening Level Values (SLVs) and Preliminary Remediation Goals (PRGs).

8. Figure 2, Facility and Site Drainage Map: The site map should include additional information such as stormwater flow directions (surface and storm drains) and locations of material storage areas, roads, berms, trenches, secondary containment, concrete barrier blocks, gravel filter strips, etc. Incorporation of aerial imagery into the map should be considered. The legend appears incomplete or needs better clarity. The figure contains a dark blue "FM" line, presumably a Force Main, but none identified as "SD" for the 2014 Storm Drain. The area outline (green dash) for DB-2 is missing. It is recommended that a separate figure (or inset) be made magnifying the north area (i.e., C-1, C-5, treatment system, and oil-water separator) as it is currently difficult to distinguish where piping, manholes, and outfalls are configured in relation to each other.